

**United States District Court  
District of Nevada (Las Vegas)  
CIVIL DOCKET FOR CASE #: 2:23-cv-01345-CDS-BNW**

Hadnagy et al v. Moss et al  
Assigned to: Judge Cristina D. Silva  
Referred to: Magistrate Judge Brenda Weksler  
Demand: \$105,000,000

Date Filed: 08/29/2023  
Jury Demand: Plaintiff  
Nature of Suit: 320 Assault Libel & Slander  
Jurisdiction: Diversity

Case in other court: Eighth Judicial District Court, A-23-875618-C  
Cause: 28:1332 Diversity-Libel,Assault,Slander

**Plaintiff**

**Christopher J. Hadnagy**

represented by **Kristofer Z Riklis**  
Riklis Law Firm, PLLC  
871 Coronado Center Drive, Suite 200  
Henderson, NV 89052  
702-720-6471  
Email: kristofer@riklislaw.com  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Plaintiff**

**Social-Engineer, LLC**

represented by **Kristofer Z Riklis**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

V.

**Defendant**

**Jeff Moss**

represented by **David A. Perez**  
Perkins Coie LLP  
1201 Third Avenue  
Suite 4900  
Seattle, WA 98101  
206-359-6767  
Email: dperez@perkinscoie.com  
*LEAD ATTORNEY*  
*PRO HAC VICE*  
*ATTORNEY TO BE NOTICED*

**Erica C. Medley**  
Holland & Hart LLP  
9555 Hillwood Drive, 2nd Fl  
Las Vegas, NV 89134  
702-222-2500  
Email: ecmedley@hollandhart.com  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Matthew J. Mertens**

Perkins Coie  
1120 N.W. Couch, 10th Floor  
Portland, OR 97209  
503-727-2199  
Fax: 503-346-2199  
Email: mmertens@perkinscoie.com  
*LEAD ATTORNEY*  
*PRO HAC VICE*  
*ATTORNEY TO BE NOTICED*

**Robert J Cassity**  
Holland & Hart LLP  
9555 Hillwood Drive, 2nd Fl  
Las Vegas, NV 89134  
702-669-4600  
Fax: 702-669-4650  
Email: bcassity@hollandhart.com  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Defendant**

**Def Con Communications, Inc.**

represented by **Erica C. Medley**  
Holland & Hart LLP  
9555 Hillwood Dr. 2nd Floor  
Las Vegas, NV 89134  
702-222-2500  
Email: ecmedley@hollandhart.com  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Matthew J. Mertens**  
(See above for address)  
*LEAD ATTORNEY*  
*PRO HAC VICE*  
*ATTORNEY TO BE NOTICED*

**Robert J Cassity**  
Holland & Hart LLP  
9555 Hillwood Dr Fl 2  
Las Vegas, NV 89134  
702-669-4600  
Fax: 702-669-4650  
Email: bcassity@hollandhart.com  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Robert J Cassity**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

Date Filed	#	Docket Text
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08/29/2023	<u>I 1</u>	PETITION FOR REMOVAL from Eighth Judicial District Court, Case Number A-23-875618-C, (Filing fee \$ 402 receipt number ANVDC-7409679) by Def Con Communications, Inc., a Washington corporation, Jeff Moss. Certificate of Interested Parties due by 9/8/2023. (Attachments: # <u>1</u> Exhibit 1, # <u>2</u> Civil Cover Sheet Civil Cover Sheet) (Cassity, Robert)  NOTICE of Certificate of Interested Parties requirement: Under Local Rule 7.1-1, a party must <u>immediately</u> file its disclosure statement with its first appearance, pleading, petition, motion, response, or other request addressed to the court. (Entered: 08/29/2023)
08/29/2023	<u>I 2</u>	CERTIFICATE of Interested Parties by Def Con Communications, Inc., a Washington corporation, Jeff Moss. There are no known interested parties other than those participating in the case. (Cassity, Robert) (Entered: 08/29/2023)
08/29/2023	<u>I</u>	Case randomly assigned to Judge Cristina D. Silva and Magistrate Judge Brenda Weksler. (AMMi) (Entered: 08/31/2023)
08/30/2023	<u>I 3</u>	MOTION/VERIFIED PETITION for Permission to Practice Pro Hac Vice by Matthew Mertens and DESIGNATION of Local Counsel Robert J. Cassity (Filing fee \$ 250 receipt number ANVDC-7412230) by Defendants Def Con Communications, Inc., a Washington corporation, Jeff Moss. (Cassity, Robert) (Entered: 08/30/2023)
08/30/2023	<u>I 4</u>	MOTION/VERIFIED PETITION for Permission to Practice Pro Hac Vice by David A. Perez and DESIGNATION of Local Counsel Robert J. Cassity (Filing fee \$ 250 receipt number ANVDC-7412231) by Defendants Def Con Communications, Inc., a Washington corporation, Jeff Moss. (Cassity, Robert) (Entered: 08/30/2023)
08/31/2023	<u>I 5</u>	MINUTE ORDER IN CHAMBERS of the Honorable Judge Cristina D. Silva on 8/31/2023. By Deputy Clerk: A.Miller. Statement regarding removed action is due by 9/15/2023. Joint Status Report regarding removed action is due by 9/30/2023. (Copies have been distributed pursuant to the NEF - AMMi) (Entered: 08/31/2023)
09/01/2023	<u>I 6</u>	STIPULATION FOR EXTENSION OF TIME (First Request) <i>Respond to Complaint</i> re <u>1</u> Petition for Removal., by Defendants Def Con Communications, Inc., Jeff Moss. (Cassity, Robert) (extend) (answer) (Entered: 09/01/2023)
09/05/2023	<u>I 7</u>	ORDER Granting <u>3</u> Verified Petition for Permission to Practice Pro Hac Vice for Attorney Matthew Mertens for Defendant's Jeff Moss and Def Con Communications, Inc., and approving Designation of Local Counsel Robert Cassity. Signed by Judge Cristina D. Silva on 9/5/2023. Any Attorney not yet registered with the Court's e-filing system shall register on the PACER website <a href="http://www.pacer.gov">www.pacer.gov</a> (Copies have been distributed pursuant to the NEF - AMMi) (Entered: 09/05/2023)
09/05/2023	<u>I 8</u>	ORDER Granting <u>4</u> Verified Petition for Permission to Practice Pro Hac Vice for Attorney David A. Perez for Defendant's Jeff Moss and Def Con Communications, Inc., and approving Designation of Local Counsel Bob Cassity. Signed by Judge Cristina D. Silva on 9/5/2023. Any Attorney not yet registered with the Court's e-filing system shall register on the PACER website <a href="http://www.pacer.gov">www.pacer.gov</a> (Copies have been distributed pursuant to the NEF - AMMi) (Entered: 09/05/2023)
09/05/2023	<u>I 9</u>	ORDER Granting <u>6</u> Stipulation for Extension of Time. Def Con Communications, Inc. and Jeff Moss answer due 10/2/2023. Signed by Magistrate Judge Brenda Weksler on 9/5/2023. (Copies have been distributed pursuant to the NEF - JQC) (Entered: 09/06/2023)
09/15/2023	<u>I 10</u>	CERTIFICATE OF SERVICE for <u>5</u> Minute Order Removal Case, by Defendants Def Con Communications, Inc., Jeff Moss.. (Cassity, Robert) (Entered: 09/15/2023)
09/15/2023	<u>I 11</u>	

		STATEMENT REGARDING REMOVAL by Defendants Def Con Communications, Inc., Jeff Moss.. (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Exhibit B)(Cassity, Robert) (Entered: 09/15/2023)
09/29/2023	<u>12</u>	Joint STATUS REPORT by Defendants Def Con Communications, Inc., Jeff Moss.. (Cassity, Robert) (Entered: 09/29/2023)
10/02/2023	<u>13</u>	MOTION to Dismiss by Defendants Def Con Communications, Inc., Jeff Moss. Responses due by 10/16/2023. (Attachments: # <u>1</u> Exhibit 1, # <u>2</u> Exhibit 2, # <u>3</u> Exhibit 3)(Cassity, Robert) (Entered: 10/02/2023)
10/16/2023	<u>14</u>	RESPONSE to <u>13</u> Motion to Dismiss by Plaintiff Christopher J. Hadnagay. Replies due by 10/23/2023. (Attachments: # <u>1</u> Declaration Declaration of Counsel in Support of Plaintiffs' Opposition to Motion to Defendants' Dismiss for Lack of Personal Jurisdiction, # <u>2</u> Exhibit Exhibit 1 To Declaration of Counsel, # <u>3</u> Exhibit Exhibit 2 To Declaration of Counsel, # <u>4</u> Exhibit Exhibit 3 To Declaration of Counsel, # <u>5</u> Exhibit Exhibit 4 To Declaration of Counsel, # <u>6</u> Exhibit Exhibit 5 To Declaration of Counsel, # <u>7</u> Exhibit Exhibit 6 To Declaration of Counsel)(Riklis, Kristofer) (Entered: 10/16/2023)
10/16/2023	<u>15</u>	MOTION to Change Venue or Transfer. Responses due by 10/30/2023. (Attachments: # <u>1</u> Exhibit A)(Cassity, Robert) (Entered: 10/16/2023)
10/23/2023	<u>16</u>	REPLY to Response to <u>13</u> Motion to Dismiss by Defendants Def Con Communications, Inc., Jeff Moss. (Cassity, Robert) (Entered: 10/23/2023)
10/30/2023	<u>17</u>	RESPONSE to <u>15</u> Motion to Change Venue/Transfer by Plaintiff Christopher J. Hadnagay. Replies due by 11/6/2023. (Attachments: # <u>1</u> Declaration Declaration of Counsel In Support of Response, # <u>2</u> Exhibit Exhibit 1 to Decl. of Riklis, # <u>3</u> Exhibit Exhibit 2 to Decl. of Riklis, # <u>4</u> Exhibit Exhibit 3 to Decl. of Riklis, # <u>5</u> Exhibit Exhibit 4 to Decl. of Riklis, # <u>6</u> Exhibit Exhibit 5 to Decl. of Riklis, # <u>7</u> Exhibit Exhibit 6 to Decl. of Riklis, # <u>8</u> Exhibit Exhibit 7 to Decl. of Riklis, # <u>9</u> Exhibit Exhibit 8 to Decl. of Riklis, # <u>10</u> Exhibit Exhibit 9 to Decl. of Riklis, # <u>11</u> Exhibit Exhibit 10 to Decl. of Riklis, # <u>12</u> Exhibit Exhibit 11 to Decl. of Riklis, # <u>13</u> Exhibit Exhibit 12 to Decl. of Riklis, # <u>14</u> Exhibit Exhibit 13 to Decl. of Riklis, # <u>15</u> Declaration Declaration of Plaintiff, # <u>16</u> Exhibit Exhibit 1 to Decl. of Plaintiff)(Riklis, Kristofer) (Entered: 10/30/2023)
11/06/2023	<u>18</u>	REPLY to Response to <u>15</u> Motion to Change Venue/Transfer by Defendants Def Con Communications, Inc., Jeff Moss. (Attachments: # <u>1</u> Exhibit A)(Cassity, Robert) (Entered: 11/06/2023)
11/17/2023	<u>19</u>	STIPULATION TO STAY DISCOVERY <i>Pending Resolution of Defendants' re <u>13</u> Motion to Dismiss, <u>15</u> Motion to Change Venue/Transfer</i> by Defendants Def Con Communications, Inc., Jeff Moss. (Cassity, Robert) (stay) (nondispositive) (Entered: 11/17/2023)
11/20/2023	<u>20</u>	ORDER <b>granting</b> ECF No. <u>19</u> Stipulation to Stay Discovery. Signed by Magistrate Judge Brenda Weksler on 11/20/2023.(Copies have been distributed pursuant to the NEF – DLS) (Entered: 11/20/2023)
12/12/2023	<u>21</u>	ORDER granting <u>15</u> Motion to Change Venue. IT IS FURTHER ORDERED that the Clerk of Court is kindly instructed to TRANSFER this case to the United States District Court for the Western District of Washington and close the case in this district. Signed by Judge Cristina D. Silva on 12/12/2023. (Copies have been distributed pursuant to the NEF – CAH) (Entered: 12/13/2023)